



March 3, 2022

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The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

In accordance with Your Honor's instructions at the February 22, 2022 status conference, we write on behalf of the *Federal Insurance* Plaintiffs, and the Plaintiffs' Executive Committee for Commercial Claims, to offer our proposal for further proceedings related to the *Havlish* and *Doe* plaintiffs' turnover proceedings.

We are in agreement with the briefing schedule presented to us by the Plaintiffs' Executive Committee for Wrongful Death and Personal Injury Claims, which we understand will be submitted to the Court in a separate letter tonight. We understand that the briefs of parties claiming an interest in the turnover proceedings contemplated by that submission will address all relevant points, including any arguments they may offer on attachment of the blocked funds pursuant to the Terrorism Risk Insurance Act, and how the Court should approach determinations as to the rights and priorities of parties claiming an interest in the blocked funds.

We look forward to the opportunity within the context of that briefing to provide the Court with a framework that will provide an efficient path for addressing all of these issues.

Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "Sean P. Carter", written over a light blue circular stamp.

SEAN P. CARTER

cc: All MDL Counsel of Record (via ECF)